

Rebecca Chester
Avon Ind. Sls. Rep.

July 17, 2006

Dear Sir or Madam:

I am very concerned about the proposed Business Opportunity Rule R511993. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell my products.

I have been an AVON INDEPENDENT SALES REPRESENTATIVE for more than six years. More importantly, Avon has been in existence for over 120 years. If the company was practicing illegal or unfair marketing, I am sure this fact would have been discovered long ago.

Originally, I became an AVON INDEPENDENT SALES REPRESENTATIVE because my family needed the extra income. Unexpectedly, Avon has brought many additional benefits that I didn't expect: travel, recognition, personal growth and purpose. My current goal is to bring my husband to an early retirement and help us to get out of debt. Our future is dependent on the stability of the direct selling industry.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Representatives. AVON'S sales kit only costs \$10. People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. After all, we are not talking about gun control. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. I also think this seven-day waiting period is unnecessary, because AVON PRODUCTS already has a 100% buyback policy for all products purchased by a salesperson within the last twelve months. There is no penalty fee if someone decides to discontinue with the company at ANY time. A large number of the people who enter Avon sign up just to be preferred customers – get their products at a discount. Part of my income is derived from these accounts. They have no interest in building a big business. I would lose income as soon as they see they have to jump through so many hoops just to get their products at a discount

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these. Besides, anyone with real concerns, only has to look as far as the internet or BBB for this information.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. I don't want my information in the hands of strangers. I

also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." I'm sorry but that is ridiculous. Even online advertisers give people an opportunity to opt out of having their info marketed to other companies. People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information only to have it sent out to strangers.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Rebecca Chester